

Barry R. McBee, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
John M. Baker, *Commissioner*
Dan Pearson, *Executive Director*



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

December 4, 1995

Larry Ballinger
Hercules Offshore Corporation
Post Office Drawer O
Freeport, Texas 77541

RE: 1996 SIP Inspection
Account No. BL-0118-V


Dear Mr. Ballinger:

Your company is scheduled for a State Implementation Plan (SIP) inspection during the Texas Natural Resource Conservation Commission (TNRCC) fiscal year, September 1995 - August 1996. So that inspection time can be utilized more efficiently, we request that you assemble and have available at your facility the information contained in the attached Investigation Preparation Guidelines (IPG).

While these guidelines have been developed so you may prepare for the SIP inspection, the TNRCC investigator is not limited to the items listed in this document. Any additional information within the scope of applicable regulations may be requested during the inspection.

If you have any questions concerning the IPG, the format of the requested information, or inspection procedures, please feel free to call Candace Bartlett of this office, at (713) 625-7837.

Sincerely,


Karen Atkinson
Air Program Manager
Region 12

Attachments

REPLY TO: REGION 12 • 4150 WESTHEIMER • HOUSTON, TEXAS 77027-4417 • AREA CODE 713-625-7900

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000

printed on recycled paper using soy-based ink

HER 03086

**TNRCC**Protecting Texas
by Reducing and
Preventing Pollution

FAX TRANSMITTAL

DATE April 4, 1996

NUMBER OF PAGES (including this cover
sheet):

10

TO: Name Larry Ballinger
Organization Hercules
FAX Number 409/233-6375

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Name Carol Harkins
Division/Region Air Program/Region 12
Telephone Number 713/767-3734
FAX Number 713/767-3761

NOTES:

Larry:

In response to the investigation conducted on 3/28/96, I'm sending you the applicable Standard Exemption (S.E.) information for your facility as we discussed.

For sandblasting you are authorized under S.E. 102 for the year 1989 and it appears that your facility is in compliance with this exemption. In 1989 a Notice of Violation was issued for causing a sandblasting nuisance. The response letter sent by Hercules is enclosed and states that no blasting will occur with an easterly wind. Please be aware that you are bound to this agreement.

For surface coating you are authorized under S.E. 75 for the year 1989. As we discussed, your current recordkeeping procedures are not kept in sufficient detail to determine compliance with the 6.0 lb/hr VOC emission limit. From the information you provided, it appears that you are in compliance with the emission limits, however, the actual hours of painting are required in order to fully make this determination. An example of the required calculations is provided for your reference. If you have any questions, feel free to call me. The next time an investigator comes to your facility, these records will be reviewed for accuracy. You are not required to re-calculate the Jan. - Mar. records for this year, but to implement the more detailed recordkeeping procedures upon receipt of this fax.

Regarding Regulation V, the surface coating of marine vessels is exempt from the control requirements of 115.421(a)(9) in accordance with 115.427(a)(1)(C).

HER 03087

Sample calculations for S.E. 75 using the epoxy primer coating MSDS you provided:

Date	Times	Coating	lb_voc/gal	gal_used	Total_voc	voc/hr.
4/2/96	9-11	primer	2.8	6	16.8	8.4
4/2/96	1-2	primer	2.8	1.5	4.2	4.2
4/2/96	2:30-4	primer	2.8	2.5	7	4.6

A mixed coating with 2.8 lb. voc/gal. means that you can use about 2 gal. of coating per/hr. This would emit 5.6 lb. voc/hr. keeping you under the 6.0 limit. Actual usage must then be averaged over a 4 hr. period. So you can use up to 8 gal. over any 4 hrs. or 8 gal. in the first hour without painting again for at least another 3 hrs. The voc emissions per unit of time are required to determine compliance, therefore, the exact hours and amounts must be recorded. Based on this example, using three different 4 hr. time periods, compliance is demonstrated as follows:

From 9-1, total voc emissions were 16.8. $16.8 \text{ lb. voc}/4 \text{ hrs.} = 4.2 \text{ lb. voc/hr.}$, which is below the 6.0 lb./hr. limit.

From 1-5, total emission were $7 + 4.2 = 11.2$. $11.2/4 \text{ hrs.} = 2.8 \text{ lb. voc/hr.}$

From 10-2, total emissions were $4.2 \text{ (from 1-2)} + 8.4 \text{ (from 10-11)} = 12.6$. $12.6/4 = 3.15 \text{ lb. voc/hr.}$

Any 4 hour period average is below the 6.0 lb./hr. limit showing compliance with the S.E. Additionally, add together the total pounds of voc emitted per week to show that you are below the 500 lbs. per week limit.

Sincerely,

Carol Harkins

HER 03088

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- (d) All permanent in-plant roads shall be watered, oiled, or paved and cleaned as necessary to achieve maximum control of dust emissions.
 - (e) The plant is located at least ¼ mile from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located.
 - (f) Before construction of the facility begins, written site approval shall be received from the Executive Director of the TACB and the facility shall be registered with Form PI-7 including a current Table 22.
 - (g) Emissions of particulate matter, sulfur dioxide, or organic compounds shall not exceed 25 tons per year each.
100. Metering, purging, and maintenance operations for gaseous and liquid petroleum pipelines (including ethylene, propylene, butylene, and butadiene pipelines) provided that operations are conducted according to the following conditions:
- (a) All emissions, except fugitive emissions, are burned in a smokeless flare, or
 - (b) Total emissions of any air contaminant will not exceed one ton during any metering, purging, or maintenance operation.
101. Any air separation, or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this exemption, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
102. Any abrasive cleaning operation that will satisfy condition (a) or (b):
- (a) Enclosed abrasive cleaning:
 - (1) The particulate matter emissions are evacuated through a fabric filter with a maximum filtering velocity of 4 feet per minute (fpm) with mechanical cleaning or 7 fpm with air cleaning; and

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- (2) There are no visible fugitive emissions from the facility.

(b) Outside blast cleaning:

- (1) Abrasive usage rate shall not exceed 150 tons per year, 15 tons per month, and 1 ton per day; and
- (2) The blast cleaning is performed at least 500 feet from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located; and
- (3) Records shall be maintained of operating hours and abrasive material usage; and
- (4) Before construction begins the facility is registered with the appropriate Regional Office using Form PI-7; and
- (5) Before construction of the facility begins, written site approval shall be received from the Executive Director of the Texas Air Control Board.

103. Refrigeration systems, including storage tanks used in refrigeration systems.

104. Surface coating operations utilizing powder coating materials with the powder applied by an electrostatic powder spray gun or an electrostatic fluidized bed.

105. Woodworking shops which satisfy one of the following conditions:

- (a) Commercial woodworking shops with a sawdust collection system exhausting to:

- (1) a fabric or cartridge filter with air cleaning and a filtering velocity no greater than 7.0 feet per minute (ft/min), or automatic sequenced mechanical cleaning and a filtering velocity no greater than 5.0 ft/min. The filter unit may vent back into the process building or to the atmosphere.

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- (4) Written site approval shall be received from the Executive Director of the TACB before construction begins for facilities utilizing existing grain receiving facilities when new gravity or auger loadout systems are to be installed.

75.

Surface coating facilities in which no metal spraying or metalizing is done, if the total emission of volatile organic compounds (VOC) used for cleanup and contained in the coating materials as applied is less than 6.0 pounds per hour (lb/hr), averaged over any 4-hour period, and 500 pounds per week, and:

- (a) The surface coating operations are performed indoors or in an enclosed work area and the following conditions apply:

- (1) If the facility is a spraying operation, all spraying is conducted in a spray booth or work area in which the emissions of particulate matter are controlled by either a water wash system or a dry filter system. For either system, the particulate removal efficiency shall be not less than 90 percent; and:

(A) The average velocity of ventilating air through the spray booth or work area shall be at least 100 feet per minute (ft/min), with a minimum face velocity at the opening of 50 ft/min, and

(B) The face velocity at the filter media shall not exceed 250 ft/min or that specified by the filter media manufacturer.

- (2) Surface coating operations may include drying or curing ovens which accelerate the release of VOC from the coatings applied by using facilities covered under this standard exemption, provided that there is no increase in the total emission of VOC from the applied coatings, and the drying or curing ovens meet the following conditions, if not electrically heated:

(A) The maximum heat input to any oven shall not exceed 40 million British thermal units per hour (Btu/hr), and

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- (4) No spraying is conducted less than 50 feet from the property line.
 - (5) Before construction begins, the facility is registered with the appropriate Regional Office using Form PI-7.
 - (6) Before construction of the facility begins, written site approval shall be received from the Executive Director of the Texas Air Control Board and any local air pollution control program having jurisdiction in the area.
 - (d) Records of hours of operation and the usage of coating materials and any solvents used for thinning and/or cleanup shall be maintained in sufficient detail to demonstrate compliance with this standard exemption. Records shall be maintained on a rolling 2-year retention period.
 - (e) The applicable requirements of Regulation V, concerning general vent gas streams and surface coatings, shall be satisfied.
76. Any new or modified pilot plant, provided that the following conditions are satisfied:
- (a) The facility does not emit any chemical having a health threshold limit value of less than one part per million by volume as specified by the Occupational Safety and Health Administration (OSHA) or the American Conference of Governmental Industrial Hygienists (ACGIH). This exemption does not apply to pilot plants using chemicals for which an OSHA or ACGIH threshold limit does not exist.
 - (b) The facility emits less than one pound per hour of any air contaminant.
 - (c) The plant is located at least 4 mile from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located.
 - (d) The facility is constructed and operated only for the purpose of:

HER 03092

115.421 (A)

(9) Miscellaneous metal parts and products coating.

(A) VOC emissions from the coating of miscellaneous metal parts and products shall not exceed the following limits for each surface coating type:

(i) 4.3 pounds per gallon (0.52 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as a clear coat; or as an interior protective coating for pails and drums;

(ii) 3.5 pounds per gallon (0.42 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as a low-bake coating; or that utilizes air or forced air driers;

(iii) 3.5 pounds per gallon (0.42 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as an extreme performance coating, including chemical milling maskants;

(iv) 3.0 pounds per gallon (0.36 kg/liter) of coating (minus water and exempt solvent) delivered to the application system for all other coating applications, including high-bake coatings, that pertain to miscellaneous metal parts and products; and

(v) 3.5 pounds per gallon (0.42 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as a prime coat for the exterior of aircraft.

(B) If more than one emission limitation in subparagraph (A) of this paragraph applies to a specific coating, then the least stringent emission limitation shall apply.

(C) All VOC emissions from non-exempt solvent washings shall be included in determination of compliance with the emission limitations in subparagraph (A) of this paragraph unless the solvent is directed into containers that prevent evaporation into the atmosphere.

HER 03093

Texas Natural Resource Conservation Commission
Chapter 115 - Control of Air Pollution From
Volatile Organic Compounds

Page 189

115.427

(a) For the Beaumont/Port Arthur, Dallas/Fort Worth, El Paso, and Houston/Galveston areas, the following exemptions shall apply:

(1) The following coating operations are exempt from the application of §115.421(a)(9) of this title (relating to Emission Specifications):

(A) exterior of fully assembled aircraft, except as required by §115.421(a)(9)(A)(v) of this title;

(B) vehicle refinishing (body shops), except as required by §115.421(a)(8)(B) and (C) of this title;

(C) exterior of fully assembled marine vessels; and

(D) exterior of fully assembled fixed offshore structures.

(2) The following coating operations are exempt from the application of §115.421(a)(10) of this title:

(A) the manufacture of exterior siding;

(B) tile board; or

(C) particle board used as a furniture component.

(3) The following exemptions shall apply to surface coating operations, except for aircraft prime coating controlled by §115.421(a)(9)(A)(v) of this title and vehicle refinishing (body shops) controlled by §115.421(a)(8)(B) and (C) of this title.

(A) Surface coating operations on a property which, when uncontrolled, will emit a combined weight of VOC of less than 3 pounds per hour and 15 pounds in any consecutive 24-hour period shall be exempt from the provisions of §115.421(a) of this title and §115.423(a) of this title (relating to Alternate Control Requirements).

(B) Surface coating operations on a property which, when uncontrolled, will emit a combined weight of VOC of less than 100 pounds in any consecutive 24-hour period shall be exempt from the provisions of §115.421(a) and §115.423(a) if documentation is provided to and approved by both the Executive Director of the Texas Natural Resource Conservation Commission and the United States Environmental Protection Agency to demonstrate that necessary coating performance criteria cannot be achieved with coating which satisfy applicable emission specifications and that control equipment is not technically or economically feasible.

(C) Mirror backing coating operations located on a property which, when uncontrolled, emit a combined weight of VOC less than 25 tons in one year (based on historical coating

HER 03094



FAX TRANSMITTAL

DATE April 4, 1996

NUMBER OF PAGES (including this cover sheet):

10

TO: Name Larry Ballinger
Organization Hercules
FAX Number 409/233-6375

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Name Carol Harkins
Division/Region Air Program/Region 12
Telephone Number 713/767-3734
FAX Number 713/767-3761

NOTES:**Larry:**

In response to the investigation conducted on 3/28/96, I'm sending you the applicable Standard Exemption (S.E.) information for your facility as we discussed.

For sandblasting you are authorized under S.E. 102 for the year 1989 and it appears that your facility is in compliance with this exemption. In 1989 a Notice of Violation was issued for causing a sandblasting nuisance. The response letter sent by Hercules is enclosed and states that no blasting will occur with an easterly wind. Please be aware that you are bound to this agreement.

For surface coating you are authorized under S.E. 75 for the year 1989. As we discussed, your current recordkeeping procedures are not kept in sufficient detail to determine compliance with the 6.0 lb/hr VOC emission limit. From the information you provided, it appears that you are in compliance with the emission limits, however, the actual hours of painting are required in order to fully make this determination. An example of the required calculations is provided for your reference. If you have any questions, feel free to call me. The next time an investigator comes to your facility, these records will be reviewed for accuracy. You are not required to re-calculate the Jan. - Mar. records for this year, but to implement the more detailed recordkeeping procedures upon receipt of this fax.

Regarding Regulation V, the surface coating of marine vessels is exempt from the control requirements of 115.421(a)(9) in accordance with 115.427(a)(1)(C).

HER 03095

Sample calculations for S.E. 75 using the epoxy primer coating MSDS you provided:

Date	Times	Coating	lb_voc/gal	gal_used	Total_voc	voc/hr
4/2/96	9-11	primer	2.8	6	16.8	8.4
4/2/96	1-2	primer	2.8	1.5	4.2	4.2
4/2/96	2:30-4	primer	2.8	2.5	7	4.6

A mixed coating with 2.8 lb. voc/gal. means that you can use about 2 gal. of coating per/hr. This would emit 5.6 lb. voc/hr. keeping you under the 6.0 limit. Actual usage must then be averaged over a 4 hr. period. So you can use up to 8 gal. over any 4 hrs. or 8 gal. in the first hour without painting again for at least another 3 hrs. The voc emissions per unit of time are required to determine compliance, therefore, the exact hours and amounts must be recorded. Based on this example, using three different 4 hr. time periods, compliance is demonstrated as follows:

From 9-1, total voc emissions were 16.8. $16.8 \text{ lb. voc}/4 \text{ hrs.} = 4.2 \text{ lb. voc/hr.}$, which is below the 6.0 lb./hr. limit.

From 1-5, total emission were $7 + 4.2 = 11.2$. $11.2/4 \text{ hrs.} = 2.8 \text{ lb. voc/hr.}$

From 10-2, total emissions were $4.2 \text{ (from 1-2)} + 8.4 \text{ (from 10-11)} = 12.6$. $12.6/4 = 3.15 \text{ lb. voc/hr.}$

Any 4 hour period average is below the 6.0 lb./hr. limit showing compliance with the S.E. Additionally, add together the total pounds of voc emitted per week to show that you are below the 500 lbs. per week limit.

Sincerely,

Carol Harkins

HER 03096

Texas Air Control Board
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- (d) All permanent in-plant roads shall be watered, oiled, or paved and cleaned as necessary to achieve maximum control of dust emissions.
 - (e) The plant is located at least 1/4 mile from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located.
 - (f) Before construction of the facility begins, written site approval shall be received from the Executive Director of the TACB and the facility shall be registered with Form PI-7 including a current Table 22.
 - (g) Emissions of particulate matter, sulfur dioxide, or organic compounds shall not exceed 25 tons per year each.
100. Metering, purging, and maintenance operations for gaseous and liquid petroleum pipelines (including ethylene, propylene, butylene, and butadiene pipelines) provided that operations are conducted according to the following conditions:
- (a) All emissions, except fugitive emissions, are burned in a smokeless flare, or
 - (b) Total emissions of any air contaminant will not exceed one ton during any metering, purging, or maintenance operation.
101. Any air separation, or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this exemption, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
102. Any abrasive cleaning operation that will satisfy condition (a) or (b):
- (a) Enclosed abrasive cleaning:
 - (1) The particulate matter emissions are evacuated through a fabric filter with a maximum filtering velocity of 4 feet per minute (fpm) with mechanical cleaning or 7 fpm with air cleaning; and

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- (2) There are no visible fugitive emissions from the facility.

(b) Outside blast cleaning:

- (1) Abrasive usage rate shall not exceed 150 tons per year, 15 tons per month, and 1 ton per day; and
- (2) The blast cleaning is performed at least 500 feet from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located; and
- (3) Records shall be maintained of operating hours and abrasive material usage; and
- (4) Before construction begins the facility is registered with the appropriate Regional Office using Form PI-7; and
- (5) Before construction of the facility begins, written site approval shall be received from the Executive Director of the Texas Air Control Board.

103. Refrigeration systems, including storage tanks used in refrigeration systems.

104. Surface coating operations utilizing powder coating materials with the powder applied by an electrostatic powder spray gun or an electrostatic fluidized bed.

105. Woodworking shops which satisfy one of the following conditions:

(a) Commercial woodworking shops with a sawdust collection system exhausting to:

- (1) a fabric or cartridge filter with air cleaning and a filtering velocity no greater than 7.0 feet per minute (ft/min), or automatic sequenced mechanical cleaning and a filtering velocity no greater than 5.0 ft/min. The filter unit may vent back into the process building or to the atmosphere.

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August 11, 1989

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- (4) Written site approval shall be received from the Executive Director of the TACB before construction begins for facilities utilizing existing grain receiving facilities when new gravity or auger loadout systems are to be installed.

75.

Surface coating facilities in which no metal spraying or metalizing is done, if the total emission of volatile organic compounds (VOC) used for cleanup and contained in the coating materials as applied is less than 6.0 pounds per hour (lb/hr), averaged over any 4-hour period, and 500 pounds per week, and:

- (a) The surface coating operations are performed indoors or in an enclosed work area and the following conditions apply:

- (1) If the facility is a spraying operation, all spraying is conducted in a spray booth or work area in which the emissions of particulate matter are controlled by either a water wash system or a dry filter system. For either system, the particulate removal efficiency shall be not less than 90 percent; and:

(A) The average velocity of ventilating air through the spray booth or work area shall be at least 100 feet per minute (ft/min), with a minimum face velocity at the opening of 50 ft/min, and

(B) The face velocity at the filter media shall not exceed 250 ft/min or that specified by the filter media manufacturer.

- (2) Surface coating operations may include drying or curing ovens which accelerate the release of VOC from the coatings applied by using facilities covered under this standard exemption, provided that there is no increase in the total emission of VOC from the applied coatings, and the drying or curing ovens meet the following conditions, if not electrically heated:

(A) The maximum heat input to any oven shall not exceed 40 million British thermal units per hour (Btu/hr), and

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- (4) No spraying is conducted less than 50 feet from the property line.
- (5) Before construction begins, the facility is registered with the appropriate Regional Office using Form PI-7.
- (6) Before construction of the facility begins, written site approval shall be received from the Executive Director of the Texas Air Control Board and any local air pollution control program having jurisdiction in the area.

(d) Records of hours of operation and the usage of coating materials and any solvents used for thinning and/or cleanup shall be maintained in sufficient detail to demonstrate compliance with this standard exemption. Records shall be maintained on a rolling 2-year retention period.

(e) The applicable requirements of Regulation V, concerning general vent gas streams and surface coatings, shall be satisfied.

76. Any new or modified pilot plant, provided that the following conditions are satisfied:

- (a) The facility does not emit any chemical having a health threshold limit value of less than one part per million by volume as specified by the Occupational Safety and Health Administration (OSHA) or the American Conference of Governmental Industrial Hygienists (ACGIH). This exemption does not apply to pilot plants using chemicals for which an OSHA or ACGIH threshold limit does not exist.
- (b) The facility emits less than one pound per hour of any air contaminant.
- (c) The plant is located at least ¼ mile from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located.
- (d) The facility is constructed and operated only for the purpose of:

HER 03100

115.421 (A)

(9) Miscellaneous metal parts and products coating.

(A) VOC emissions from the coating of miscellaneous metal parts and products shall not exceed the following limits for each surface coating type:

(i) 4.3 pounds per gallon (0.52 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as a clear coat, or as an interior protective coating for pails and drums;

(ii) 3.5 pounds per gallon (0.42 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as a low-bake coating; or that utilizes air or forced air driers;

(iii) 3.5 pounds per gallon (0.42 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as an extreme performance coating, including chemical milling maskants;

(iv) 3.0 pounds per gallon (0.36 kg/liter) of coating (minus water and exempt solvent) delivered to the application system for all other coating applications, including high-bake coatings, that pertain to miscellaneous metal parts and products; and

(v) 3.5 pounds per gallon (0.42 kg/liter) of coating (minus water and exempt solvent) delivered to the application system as a prime coat for the exterior of aircraft.

(B) If more than one emission limitation in subparagraph (A) of this paragraph applies to a specific coating, then the least stringent emission limitation shall apply.

(C) All VOC emissions from non-exempt solvent washings shall be included in determination of compliance with the emission limitations in subparagraph (A) of this paragraph unless the solvent is directed into containers that prevent evaporation into the atmosphere.

Texas Natural Resource Conservation Commission
Chapter 115 - Control of Air Pollution From
Volatile Organic Compounds

Page 189

115.427

(a) For the Beaumont/Port Arthur, Dallas/Fort Worth, El Paso, and Houston/Galveston areas, the following exemptions shall apply:

(1) The following coating operations are exempt from the application of §115.421(a)(9) of this title (relating to Emission Specifications):

(A) exterior of fully assembled aircraft, except as required by §115.421(a)(9)(A)(v) of this title;

(B) vehicle refinishing (body shops), except as required by §115.421(a)(8)(B) and (C) of this title;

(C) exterior of fully assembled marine vessels; and

(D) exterior of fully assembled fixed offshore structures.

(2) The following coating operations are exempt from the application of §115.421(a)(10) of this title:

(A) the manufacture of exterior siding;

(B) tile board; or

(C) particle board used as a furniture component.

(3) The following exemptions shall apply to surface coating operations, except for aircraft prime coating controlled by §115.421(a)(9)(A)(v) of this title and vehicle refinishing (body shops) controlled by §115.421(a)(8)(B) and (C) of this title.

(A) Surface coating operations on a property which, when uncontrolled, will emit a combined weight of VOC of less than 3 pounds per hour and 15 pounds in any consecutive 24-hour period shall be exempt from the provisions of §115.421(a) of this title and §115.423(a) of this title (relating to Alternate Control Requirements).

(B) Surface coating operations on a property which, when uncontrolled, will emit a combined weight of VOC of less than 100 pounds in any consecutive 24-hour period shall be exempt from the provisions of §115.421(a) and §115.423(a) if documentation is provided to and approved by both the Executive Director of the Texas Natural Resource Conservation Commission and the United States Environmental Protection Agency to demonstrate that necessary coating performance criteria cannot be achieved with coating which satisfy applicable emission specifications and that control equipment is not technically or economically feasible.

(C) Mirror backing coating operations located on a property which, when uncontrolled, emit a combined weight of VOC less than 25 tons in one year (based on historical coating

HER 03102

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Office of Air Quality
Technical Services

EMISSIONS/INSPECTION FEE FORM
Fiscal Year 1997
(9/1/96 - 8/31/97)

FEE DUE BY: 11/01/96

ARN: _____ Date: _____

AMT: _____ CHK. NO. _____

AGENCY USE ONLY

COMPANY ACCOUNT INFORMATION

****PLEASE NOTIFY TNRCC IMMEDIATELY IF THIS ACCOUNT HAS BEEN SOLD.**

HERCULES OFFSHORE FACILITY
906 MARLIN LANE
FREEPORT, TX 77541

ACCOUNT NUMBER: BLO118V
SITE: BARGE CLEANING FACILITY
COUNTY: BRAZORIA SIC: 4491
FEDERAL TAX ID NUMBER: 76-0415601
TEXAS CHARTER NUMBER:

Company Contact:

Larry Ballinger
(Please Print Name)
(409) 233-6371
(Phone)

Facility Sold? **Yes _____ No XX

****Attach New Name, Address, & Telephone Number**

(PLEASE INDICATE ANY CHANGES ABOVE)

List below the Current Permit Allowables and/or Actual Emissions
to be based on Calendar Year 1995

Regulated Pollutants (Only add others that cannot be categorized as one of these)	(1) Sum of Permitted Allowables used (tons per year) (See Instructions)	(2) Sum of Actual Emissions Used (tpy) from Calendar Year 1995 (See Instructions)	(3) Sum of columns (1&2) to yield total for each pollutant. (Not To Exceed 4,000 Tons Per Regulated Pollutant.)
VOLATILE ORGANIC COMPOUNDS	3	N/A	3
NITROGEN OXIDES	2	N/A	2
TOTAL SUSPENDED PARTICULATE	1	N/A	1
SULFUR DIOXIDE	13	N/A	13
CARBON MONOXIDE	1	N/A	1
(PLEASE ATTACH ADDITIONAL PAGES AS NEEDED)			Total (TPY) (Rounded UP) 20

[A] Inspection Fee: (Amount from SIC Fee Table, **IF APPLICABLE**) \$ -0-
[B] Emissions Fee: Total TPY x \$26.00 (\$26 minimum, **IF APPLICABLE**) \$ 520.00
[C] Pay the GREATER (A or B) and enter here: \$ 520.00

Comments/Additional Information:

RETURN COMPLETED FORM & REMITTANCE TO:
(SEE ADDRESS ON BACK OF FORM)

FEE-97

8/01/96

HER 03103

Texas Natural Resource Conservation Commission

Office of Air Quality
Technical Services
(512) 239-1532

EMISSIONS/INSPECTION FEE FORM
Fiscal Year 1996
(9/1/95 - 8/31/96)

ARN: _____ DATE: _____

AMT: _____ CHK. NO. _____

AGENCY USE ONLY

Company Account Information

**** PLEASE NOTIFY TNRCC IMMEDIATELY IF THIS ACCOUNT HAS BEEN SOLD.**

Company Contact:

HERCULES OFFSHORE FACILITY
906 MARLIN
FREEPORT, TX 77541

Larry Ballinger
(Please Print Name)

(409) 233- 6771
(Phone)

Account No.: BLO118V
Site Name: BARGE CLEANING FACILITY
County: BRAZORIA
SIC Code: 4491 Fee Due By: 11/15/95

Federal ID No. 76-0415601

Texas Charter No. _____

Facility Sold? **Yes _____ No X

**** Attach New Name, Address, & Telephone Number**

(PLEASE INDICATE ANY CHANGES ABOVE)

List below the Current Permit Allowables and/or
Actual Emissions to be based on Calendar Year 1994.

Regulated Pollutants (Only add others that cannot be categorized as one of these)	(1) Sum of Permitted Allowables used (tons per year) (See Instructions)	(2) Sum of Actual Emissions Used (tpy) from Calendar Year 1994 (See Instructions)	Sum of columns (1 & 2) to yield total for each pollutant. (Not To Exceed 4,000 Tons Per Regulated Pollutant.)
VOLATILE ORGANIC COMPOUNDS	3	N/A	3
NITROGEN OXIDES	2	N/A	2
TOTAL SUSPENDED PARTICULATE	1	N/A	1
SULFUR DIOXIDE	13	N/A	13
CARBON MONOXIDE	1	N/A	1
(PLEASE ATTACH ADDITIONAL PAGES AS NEEDED)			Total (TPY) (Rounded Up) 20

[A] Inspection Fee: (Amount from SIC Fee Table, **IF APPLICABLE**) . . . \$ -0-

[B] Emissions Fee: Total T/Y X \$26.00 (\$26 minimum, **IF APPLICABLE**) . \$ 520.00

[C] Pay the **GREATER** (A or B) and enter here: . . . \$ 520.00

Comments/Additional Information:

**RETURN COMPLETED FORM & REMITTANCE TO:
(SEE ADDRESSES ON BACK OF FORM)**

FEE-96
(7-25-95)

HER 03104